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November 10, 2014

**BY CERTIFIED MAIL**

Marc Dipietro, President  
D & D Welding and Salvage Corp.  
156 Ashland Ave.  
Southbridge, MA 01550  
Certified Mail # 7012 2210 0001 3554 4755

RECEIVED  
NOV 15 2014  
OFFICE OF THE REGIONAL ADMINISTRATOR

Re: 60-Day Notice of Violations and Intent to File Suit Regarding Noncompliance  
with Federal Clean Water Act's Industrial Stormwater Discharge Requirements:  
146 Ashland Ave, Southbridge MA

Dear Mr. Dipietro:

This office represents Clean Water Action, a national non-profit citizens' organization working for prevention of pollution in the nation's waters, protection of natural resources, creation of environmentally-safe jobs and businesses, and empowerment of people to make democracy work. Clean Water Action has over one million members nationally, more than 50,000 of whom reside in Massachusetts.

We write to give notice that Clean Water Action intends to file a civil action in the United States District Court for the District of Massachusetts under section 505 of the Federal Clean Water Act (the "Act") against D and D Welding & Salvage ("D & D"). The subject of the action will be D & D's unlawful discharge of stormwater from its scrap and waste recycling facility at 146 Ashland Ave, Southbridge (the "Facility"). Stormwater runoff from the Facility is discharged into an unnamed tributary to the Quinebaug River.

D & D submitted Notices of Intent ("NOIs") to be covered by the EPA's Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (the "Permit") on

April 7, 2009, December 13, 2011 and June 5, 2013.<sup>1</sup> Since its first submission, D & D has repeatedly failed to comply with the Permit's benchmark monitoring requirements. On those occasions when the company did monitor, the results often showed levels of copper and iron above EPA benchmark limits. The ongoing nature of these exceedances shows that the company is not implementing adequate control measures or taking appropriate corrective action. Furthermore, the company failed to submit annual reports documenting required comprehensive site inspections for most of the years it has been covered by the Permit.

## **BACKGROUND**

Activities that take place at industrial facilities, such as material handling and storage, are often exposed to the weather. As runoff from rain or snowmelt comes into contact with these materials, it picks up pollutants and transports them to nearby rivers, lakes, or coastal waters and tributaries thereto, including but not limited to storm sewer systems, wetlands, and other surface waters. Stormwater pollution is a significant source of water quality problems for the nation's waters.

The following are some of the activities, pollutant sources and pollutants that may be present with D & D's scrap and waste recycling processes:<sup>2</sup>

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<sup>1</sup> The Stormwater Permit expired on September 29, 2013, but has been administratively continued on its own terms.

<sup>2</sup> Source: EPA Industrial Stormwater Fact Sheet Series, Sector N: Scrap Recycling and Waste Recycling Facilities, recovered from [http://water.epa.gov/polwaste/npdes/stormwater/upload/sector\\_n\\_scraprecycling.pdf](http://water.epa.gov/polwaste/npdes/stormwater/upload/sector_n_scraprecycling.pdf).

Activity	Pollutant Source	Pollutant
Stockpiling and storage of materials (including loading and unloading)	Leaking of various fluids from used automotive engines, radiators, brake fluid reservoirs, transmission housings, other vehicle parts, and lead-acid from batteries; Deterioration/corrosion of materials	PCBs; oil and grease; lubricants; paint pigments or additives; heavy metals; ionizing radioactive isotopes; transmission and brake fluids; fuel; battery acid; lead acid; antifreeze; benzene; chemical residue; heating oil; petroleum products; solvents; ionizing radioactive isotopes; infectious/bacterial contamination; asbestos; metals; total Kjeldahl nitrogen (TKN); oily wastes; chemical residue
Material processing: Air pollution equipment (including incinerators, furnaces, wet scrubbers, filter houses, and bag houses)	Normal equipment operations that include the collection and disposal of filter bag material and ash, process wastewater from scrubbers, accumulation of particulate matter around leaking joint connections, malfunctioning pumps and motors (e.g., leaking gaskets, seals or pipe connections, leaking oil-filled transformer casings)	Hydraulic fluids; oils; fuels; grease and other lubricants; accumulated particulate matter; chemical additives; and PCBs from oil-filled electrical equipment.
Material processing: Combustion engines	Spills and/or leaks from fuel tanks; spills/leaks from oil/hydraulic fuel reservoirs; faulty/leaking hose connections; worn gaskets; leaking transmissions, crankcases, and brake systems (if applicable); leaking battery casings and/or corroded terminals	Accumulated particulate matter; oil/Lubricants; gas/diesel fuel; fuel additives; antifreeze (ethylene glycol); battery acid; and products of incomplete combustion

Material processing: Material handling systems (forklifts, cranes, and conveyors)	Spills and leaks from fuel tanks, hydraulic and oil reservoirs due to malfunctioning parts (e.g., worn gaskets and parts, leaking hose connections, and faulty seals). Damaged or faulty electrical switches (mercury filled). Damaged or leaking battery casings, including exposed corroded battery terminals. Damaged or worn bearing housings.	Hydraulic fluids; oils, fuels and fuel additives; grease and other lubricants; accumulated particulate matter; chemical additives; mercury; lead; battery acid.
Material processing: Stationary scrap processing facilities (balers, briquetters, shredders, shearers, compactors, engine block/cast iron breakers, wire chopper, turnings crusher)	Leaks from hydraulic reservoirs, hose and fitting connections; worn gaskets; spills or leaks from fuel tanks; particulates/residue from scrap processing; malfunctioning pumps and motors (e.g., leaking gaskets, seals or pipe connections, leaking oil-filled transformer casings)	Heavy metals (e.g., zinc, copper, lead, cadmium, chromium) and hydraulic fluids; PCBs
Material processing: Hydraulic equipment and systems, balers/briquetter, shredders, shearers, compactors, engine block/cast iron breaker, wire chopper, turnings crusher	Particulate/residue from material Processing; spills and/or leaks from fuel tanks; spills/leaks from oil/hydraulic fuel reservoirs; faulty/leaking hose connections/fittings; leaking gaskets	Hydraulic fluids/oils; lubricants; particulate matter from combustion engines; PCBs (oil-filled electrical equipment components); heavy metals (nonferrous, ferrous)
Material processing: Electrical control systems (transformers, electrical switch gear, motor starters)	Oil leakage from transformers; leakage from mercury float switches; faulty detection devices	PCBs; mercury (float switches); ionizing radioactive material (fire/smoke detection systems)
Material processing: Torch cutting	Residual/accumulated particulates	Heavy metal fragments, fines
Material handling systems	Spills and/or leaks from fuel tanks; spills/leaks from oil/hydraulic fuel reservoirs; faulty/leaking hose connections/fittings; leaking gaskets	Accumulated particulate matter (ferrous and nonferrous metals, plastics, rubber, other); oil/lubricants; PCBs (electrical equipment); mercury (electrical controls); lead/battery acids

Vehicle maintenance	Parts cleaning; waste disposal of rags; oil filters; air filters; batteries; hydraulic fluids; transmission fluids; brake fluids; coolants; lubricants; degreasers; spent solvents	Gas/diesel fuel; fuel additives; oil/lubricants; heavy metals; brake fluids; transmission fluids; chlorinated solvents; arsenic
Vehicle fueling	Spills and leaks during fuel transfer; spills due to "topping off" tanks; runoff from fueling areas; washdown of fueling areas; leaking storage tanks; spills of oils; brake fluids; transmission fluids; engine coolants	Gas/diesel fuel; fuel additives; oil; lubricants; heavy metals
Vehicle and equipment cleaning and washing	Washing and steam cleaning	Solvent cleaners; oil/lubricants/additives; antifreeze (ethylene glycol)

Clean Water Action will ask the Court to ensure D & D's future compliance with the Act, assess civil penalties in an appropriate amount,<sup>3</sup> award plaintiff its litigation costs, including attorney and expert fees, and award any other relief the Court deems appropriate. Clean Water Action's complaint will be filed a minimum of 60 days after the postmark date of this letter. This is a formal 60-day notice of intent to sue that is being served pursuant to 40 C.F.R., Part 135.

This notice is being provided by:

Cindy Luppi, New England Regional Co-Director  
Clean Water Action  
262 Washington Street, Suite 301  
Boston, MA 02108  
(617) 338-8131  
(617) 335-6449 (fax)

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<sup>3</sup> The Statute authorizes the Court to assess a penalty of up to \$37,500 a day for each violation. See 33 U.S.C. § 1319(d) and 78 Fed. Reg. 66647 (Nov. 6, 2013).

Counsel for Clean Water Action in this case is:  
Nora J. Chorover  
Stern, Shapiro, Weissberg & Garin, LLP  
90 Canal Street, Suite 500  
Boston, MA 02114  
(617) 742-5800  
(617) 742-5858 (fax)

### **D & D'S VIOLATIONS AND DATES OF VIOLATIONS**

D & D's violations are described below and are also set forth on a Table attached as Exhibit A hereto.<sup>4</sup> The Complaint, when filed, will set forth additional days of violations that occur between the date of this letter and the date on which the Complaint is filed.

1. Failure to Comply with the Permit's Monitoring, Inspection, and Reporting Requirements.

D & D is required to collect and analyze stormwater and document the monitoring activities used on site on a quarterly basis.<sup>5</sup> D & D is required to monitor for the presence of chemical oxygen demand, total suspended solids, aluminum, copper, iron, lead and zinc in its stormwater discharges. D & D failed to comply with the Permit's monitoring requirements. In particular, the company failed to perform benchmark monitoring during all of the required monitoring quarters; it has never performed benchmark monitoring in four consecutive monitoring quarters. D & D ceased monitoring for zinc, TSS, lead, aluminum and COD after June 9, 2010, without having performed monitoring in four consecutive monitoring quarters. Since September 30, 2010, the company has monitored its stormwater discharges for iron and copper in only three out of the 16 monitoring quarters.

D & D is required to report certain information to EPA and the Massachusetts Department of Environmental Protection ("Mass DEP") regarding its stormwater discharges in accordance with the provisions of Section 7 of the Permit. The company must submit quarterly

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<sup>4</sup> Clean Water Action believes that violations have occurred on the dates identified in this letter and on Exhibit A, and not just on rain days. However, to the extent it is determined that rain days are relevant in determining the dates of violations, such rain dates through October 30, 2014 are set forth on Exhibit B hereto. The complaint, when filed, will set forth additional rain dates since October 30, 2014.

<sup>5</sup> See Permit Section 6.1.

benchmark monitoring data to EPA within 30 days following receipt of monitoring results.<sup>6</sup> D & D failed to comply with these requirements.

D & D is required to submit an annual report to EPA regarding the findings from its annual comprehensive site inspections and corrective actions that may be required.<sup>7</sup> D & D submitted an annual report in 2013, but failed to submit any other annual reports.

To the extent additional monitoring, reporting or inspection violations become known to Clean Water Action before the action is filed, the complaint will seek remedy for such additional violations. To the extent additional monitoring, reporting or inspection violations are learned through discovery in this action, the complaint will be amended to seek remedy for such additional violations.

## 2. Failure to Implement Adequate Control Measures and Corrective Action.

The Permit requires D & D to ensure that its control measures minimize its stormwater pollutant discharges. Permit, Section 2.0, pg. 12.<sup>8</sup> D & D must modify its control measures as expeditiously as practicable whenever it finds that they “are not achieving their intended effect of minimizing pollutant discharges.” *Id.*, Section 2.1. Corrective action must be taken whenever the results of monitoring show that “an exceedance of the 4 quarter average is mathematically certain.”<sup>9</sup> Documentation of corrective action must be included in the annual report.<sup>10</sup>

As shown in the following table, D & D’s stormwater discharges have exceeded the benchmark for copper whenever samples were taken. The iron benchmark has also been exceeded on several occasions. The most recent sampling data for iron, taken in April 2013, shows levels at almost twice the benchmark.

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<sup>6</sup> See Permit, Section 7.1; If the data contains any exceedences of benchmarks, it must also be submitted to Mass DEP. See Permit, Section 9.1.2.4.

<sup>7</sup> See Permit, Section 7.2, pg. 41.

<sup>8</sup> “Minimize” means “reduce and/or eliminate to the extent achievable using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best industry practice.” *Id.*

<sup>9</sup> Permit, pg. 19.

<sup>10</sup> *Id.*

**TABLE OF MONITORING RESULTS SHOWING BENCHMARK EXCEEDENCES**

<b><u>Collection Quarter</u></b>	<b><u>Collection Date</u></b>	<b><u>Iron</u> <b>(1.0 mg/L)</b></b>	<b><u>Copper</u> <b>(.0156 mg/L)</b></b>
July – Sept 2014	not sampled	not sampled	not sampled
April – June 2014	not sampled	not sampled	not sampled
Jan – Mar 2014	not sampled	not sampled	not sampled
Oct – Dec 2013	not sampled	not sampled	not sampled
July – Sept 2013	not sampled	not sampled	not sampled
April-June 2013	4/12/2013	<b>1.9</b>	<b>0.09</b>
Jan – Mar 2013	not sampled	not sampled	not sampled
Oct – Dec 2012	not sampled	not sampled	not sampled
July – Sept 2012	not sampled	not sampled	not sampled
April-June 2012	5/1/2012	0.65	<b>0.07</b>
Jan – Mar 2012	not sampled	not sampled	not sampled
Oct-Dec 2011	10/19/2011	<b>2.6</b>	<b>0.13</b>
July – Sept 2011	not sampled	not sampled	not sampled
April – June 2011	not sampled	not sampled	not sampled
Jan – Mar 2011	not sampled	not sampled	not sampled
Oct – Dec 2010	not sampled	not sampled	not sampled
July-Sept 2010	9/30/2010	0.88	<b>0.06</b>
April-June 2010	6/9/2010	0.74	<b>0.05</b>
Jan – Mar 2010	not sampled	not sampled	not sampled
Oct-Dec 2009	11/20/2009	<b>1.5</b>	<b>0.82</b>
	10/7/2009	<b>3.4</b>	<b>0.08</b>
July – Sept 2009	not sampled	not sampled	not sampled
April-June 2009	6/18/2009	1	<b>0.08</b>

The presence and persistence of these exceedences show that the company has not complied with the requirement to “modify” its control measures “as expeditiously as practicable” to minimize its pollutant discharges.<sup>11</sup> Moreover, since D & D never monitored any of the applicable parameters for four consecutive monitoring quarters, and is not regularly monitoring its iron or copper discharges as required by the Permit, it cannot know how its control measures are performing, and therefore cannot have been modifying them as necessary to minimize stormwater pollutant discharges.

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<sup>11</sup> Moreover, the Permit requires the company to implement corrective action as set forth in Section 3.2 whenever the average of 4 quarterly sample results exceeds an applicable benchmark. To the extent corrective action was taken by the company following the triggering of this event, such corrective action was inadequate, as shows by the fact that benchmark exceedences have persisted.



D & D Welding and Salvage Corp.

11/10/2014

Page 9

This Notice Letter alleges that D & D failed to implement adequate control measures based on information presently available to Clean Water Action. If additional information regarding this violation becomes known to Clean Water Action in the future, the complaint may set forth some or all of such additional information.

### **CONCLUSION**

Clean Water Action believes this Notice of Violations and Intent to File Suit sufficiently states the basis for a civil action. During the 60-day notice period, we would be willing to discuss effective remedies for the violations noted in this letter that may avoid the necessity of litigation. If you wish to pursue such discussions, please have your attorney contact us within the next 20 days so that negotiations may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nora J. Chorover".

Nora J. Chorover

Attorney for

CLEAN WATER ACTION

D & D Welding and Salvage Corp.

11/10/2014

Page 10

cc: (by certified mail)

Curt Spalding, Regional Administrator

EPA New England, Region 1,

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Boston MA 02109

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Gina McCarthy, Administrator

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Marc Dipietro, Registered Agent for

D & D Welding and Salvage Corp.

146 Ashland Ave.

Southbridge, MA 01550

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**EXHIBIT A**  
**TABLE OF VIOLATIONS**  
November 2009 to the Present

<u>Type of Violation</u>	<u>Parameter</u>	<u>Beginning Date of Violation</u>	<u>Earliest End Date of Violation</u>
Failure to Implement Adequate Control Measures	Iron	November 1, 2009*	Present
Failure to Implement Adequate Control Measures	Copper	November 1, 2009*	Present
Failure to Implement Adequate Control Measures	Zinc	November 1, 2009*	Present
Failure to Implement Adequate Control Measures	TSS	November 1, 2009*	Present
Failure to Implement Adequate Control Measures	Lead	November 1, 2009*	Present
Failure to Implement Adequate Control Measures	Aluminum	November 1, 2009*	Present
Failure to Implement Adequate Control Measures	COD	November 1, 2009*	Present
Failure to Conduct Required Comprehensive Site Inspections	n/a	September 29, 2010	Present
Failure to Conduct Required Comprehensive Site Inspections	n/a	September 29, 2011	Present
Failure to Conduct Required Comprehensive Site Inspections	n/a	September 29, 2012	Present
Failure to Submit Annual Reports	n/a	November 13, 2010	Present
Failure to Submit Annual Reports	n/a	November 13, 2010	Present
Failure to Submit Annual Reports	n/a	November 13, 2011	Present
Failure to Submit Annual Reports	n/a	November 13, 2012	Present
Failure to Report Results of Benchmark Monitoring; Oct – Dec QTR 2009	All	December 20, 2009	September 1, 2010
Failure to Conduct Benchmark Monitoring; Jan – Mar QTR 2010	All	March 31, 2010	Present
Failure to Report Results of Benchmark Monitoring; Jan – Mar QTR 2010	All	April 30, 2010	Present
Failure to Report Results of Benchmark Monitoring; Apr – June QTR 2010	All	July 9, 2010	September 1, 2010

\* D & D failed to monitor its benchmarks in numerous monitoring quarters, commencing with the July – September 2009 monitoring quarter. Therefore, as of at the latest November 10, 2009, it could not have known how its control measures were performing and could not have been modifying them as necessary to minimize stormwater pollutant discharge.

<u>Type of Violation</u>	<u>Parameter</u>	<u>Beginning Date of Violation</u>	<u>Earliest End Date of Violation</u>
Failure to Conduct Benchmark Monitoring; July – Sept QTR 2010	Zinc, TSS, Lead, Aluminum, COD	September 30, 2010	Present
Failure to Report Results of Benchmark Monitoring; July – Sept QTR 2010	All	October 20, 2010	December 15, 2010
Failure to Conduct Benchmark Monitoring; Oct – Dec QTR 2010	All	December 31, 2010	Present
Failure to Report Results of Benchmark Monitoring; Oct – Dec QTR 2010	All	January 31, 2011	Present
Failure to Conduct Benchmark Monitoring; Jan – Mar QTR 2011	All	March 31, 2011	Present
Failure to Report Results of Benchmark Monitoring; Jan – Mar QTR 2011	All	April 30, 2011	Present
Failure to Conduct Benchmark Monitoring; Apr – June QTR 2011	All	June 30, 2011	Present
Failure to Report Results of Benchmark Monitoring; Apr – June QTR 2011	All	July 31, 2011	Present
Failure to Conduct Benchmark Monitoring; July – Sept QTR 2011	All	September 30, 2011	Present
Failure to Report Results of Benchmark Monitoring; July – Sept QTR 2011	All	October 31, 2011	Present
Failure to Conduct Benchmark Monitoring; Oct – Dec QTR 2011	Zinc, TSS, Lead, Aluminum, COD	December 31, 2011	Present
Failure to Report Results of Benchmark Monitoring; Oct – Dec QTR 2011	All	November 19, 2011	July 17, 2012
Failure to Conduct Benchmark Monitoring; Jan – Mar QTR 2012	All	March 31, 2012	Present
Failure to Report Results of Benchmark Monitoring; Jan – Mar QTR 2012	All	April 30, 2012	Present
Failure to Conduct Benchmark Monitoring; Apr – June QTR 2012	Zinc, TSS, Lead, Aluminum, COD	June 30, 2012	Present
Failure to Report Results of Benchmark Monitoring; Apr – June QTR 2012	All	June 1, 2012	July 18, 2012
Failure to Conduct Benchmark Monitoring; July – Sept QTR 2012	All	September 30, 2012	Present
Failure to Report Results of Benchmark Monitoring; July – Sept QTR 2012	All	October 31, 2012	Present
Failure to Conduct Benchmark Monitoring; Oct – Dec QTR 2012	All	December 31, 2012	Present
Failure to Report Results of Benchmark Monitoring; Oct – Dec QTR 2012	All	January 31, 2013	Present

<u>Type of Violation</u>	<u>Parameter</u>	<u>Beginning Date of Violation</u>	<u>Earliest End Date of Violation</u>
Failure to Conduct Benchmark Monitoring; Jan – Mar QTR 2013	All	March 31, 2013	Present
Failure to Report Results of Benchmark Monitoring; Jan – Mar QTR 2013	All	April 30, 2013	Present
Failure to Conduct Benchmark Monitoring; Apr – June QTR 2013	Zinc, TSS, Lead, Aluminum, COD	June 30, 2013	Present
Failure to Report Results of Benchmark Monitoring; Apr – June QTR 2013	All	May 12, 2013	June 18, 2013
Failure to Conduct Benchmark Monitoring; July – Sept QTR 2013	All	September 30, 2013	Present
Failure to Report Results of Benchmark Monitoring; July – Sept QTR 2013	All	October 31, 2013	Present
Failure to Conduct Benchmark Monitoring; Oct – Dec QTR 2013	All	December 31, 2013	Present
Failure to Report Results of Benchmark Monitoring; Oct – Dec QTR 2013	All	January 31, 2014	Present
Failure to Conduct Benchmark Monitoring; Jan – Mar QTR 2014	All	March 31, 2014	Present
Failure to Report Results of Benchmark Monitoring; Jan – Mar QTR 2014	All	April 30, 2014	Present

## **EXHIBIT B**

### **DAYS BETWEEN NOVEMBER 5, 2009 AND OCTOBER 30, 2014 ON WHICH STORMWATER FROM FACILITY DISCHARGED TO WATERS OF THE UNITED STATES**

November 2009:	14, 15, 20, 21, 24, 27, 28
December 2009:	1, 3, 6, 9, 10, 14, 20, 27, 28
January 2010:	2, 3, 4, 18, 20, 26, 29
February 2010:	17, 24, 25, 26
March 2010:	1, 14, 15, 16, 23, 24, 26, 29, 30, 31
April 2010:	10, 17, 18, 27
May 2010:	5, 8, 9, 14, 19, 27, 30
June 2010:	2, 4, 6, 7, 10, 11, 13, 21, 23
July 2010:	11, 14, 22, 24, 25
August 2010:	5, 6, 10, 23, 24, 25
September 2010:	17, 28, 29
October 2010:	1, 2, 4, 5, 6, 7, 15, 16, 28
November 2010:	5, 6, 8, 9, 17, 26
December 2010:	2, 13, 27
January 2011:	9, 12, 13, 18, 19, 21, 22, 26, 27
February 2011:	2, 3, 6, 8, 25, 26, 27, 28
March 2011:	1, 7, 11, 12, 17, 22
April 2011:	1, 2, 5, 6, 13, 14, 17, 20, 24, 29
May 2011:	5, 15, 16, 17, 18, 19, 24, 25, 31
June 2011:	1, 2, 9, 10, 11, 12, 14, 18, 23, 24, 25, 26, 29
July 2011:	8, 9, 14, 26, 27
August 2011:	7, 8, 10, 15, 16, 26, 28, 29
September 2011:	6, 7, 8, 9, 21, 24, 29, 30
October 2011:	4, 5, 13, 14, 15, 20, 27, 28, 30
November 2011:	11, 17, 23, 24, 30
December 2011:	7, 8, 22, 23, 28
January 2012:	2, 12, 13, 17, 19, 20, 21, 22, 24, 27, 28
February 2012:	17, 25
March 2012:	1, 3, 4, 9, 29
April 2012:	2, 12, 13, 23, 24
May 2012:	2, 3, 9, 10, 16, 23, 30
June 2012:	2, 3, 4, 5, 7, 13, 14, 23, 24, 25, 26
July 2012:	4, 18, 19, 24, 25, 29
August 2012:	2, 6, 11, 13, 15, 16, 18, 28, 29
September 2012:	5, 6, 9, 19, 23, 29, 30
October 2012:	3, 8, 11, 14, 15, 20, 29, 30, 31
November 2012:	8, 9, 13, 14, 28

December 2012:	8, 9, 10, 17, 18, 21, 22, 27, 28, 30
January 2013:	12, 16, 17, 29, 30, 31
February 2013:	9, 12, 20, 24, 25, 27, 28
March 2013:	7, 8, 9, 13, 19, 20
April 2013:	1, 12, 13, 20
May 2013:	9, 10, 12, 20, 21, 22, 24, 25, 26, 27, 29, 30
June 2013:	3, 4, 7, 8, 11, 12, 14, 15, 18, 19, 28, 29
July 2013:	2, 9, 11, 12, 14, 23, 24, 26
August 2013:	2, 10, 27, 29
September 2013:	1, 2, 3, 11, 13, 22, 23
October 2013:	5, 6, 7, 8
November 2013:	2, 7, 8, 18, 27, 28
December 2013:	7, 10, 15, 18, 24, 30
January 2014:	3, 6, 7, 11, 12, 15, 19
February 2014:	4, 5, 6, 14, 16, 19, 20, 21, 22
March 2014:	13, 20, 29, 30, 31
April 2014:	1, 5, 8, 12, 16, 24, 26, 27
May 2014:	1, 11, 17, 23, 26
June 2014:	6, 14, 26, 27
July 2014:	3, 4, 5, 8, 14, 15, 16, 24, 28
August 2014:	13, 14, 22, 28
September 2014:	2, 6, 13, 21, 30
October 2014:	1, 2, 4, 11, 16, 18, 22, 23, 24